

# Project for Mining – input on GRI **Item 06 – GRI Sector Standards Topic and Universal Standards** position

### For GSSB information

| 1 December 2023  |  |  |  |
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| 14 December 2023   |  |  |  |
| GRI Sector Standards Project for Mining  |  |  |  |
| Description This document summarizes the input relevant to GRI Topic Standards collected during the GRI Sector Standards Project for Mining. This document includes the preliminary opinion of the Standards Division based on the outcomes of the Mining Project. However, recommendations to the GSSB work program will be made by the Standards Division on the basis of cumulative input from multiple Sector Standards projects.  |  |  |  |
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#### Background 1

2 In addition to developing GRI Sector Standards as outlined in the Program Description, the Sector

- 3 Program supports the enhancement and expansion of the GRI Standards by identifying and raising
- 4 issues not previously covered by the standards system.
- 5 The Standards Division will make proposals to the Global Sustainability Standards Board (GSSB) for
- 6 the development of new or the revision of existing Standards, which the GSSB will consider and
- prioritize during the regular reviews of the GSSB work program as per the Due Process Protocol. 7
- 8 Feedback on GRI Topic and Universal Standards was collected throughout the GRI Mining Standard 9 development process, including through research activities, working group interactions, and the public
- 10 comment period.
- 11 This document summarizes the feedback and provides the preliminary opinion of the Standards
- 12 Division based on the outcomes of the Mining Project. Recommendations to the GSSB work program
- will be made by the Standards Division on the basis of cumulative input from numerous Sector 13
- 14 Standards projects.

# Input on Topic Standards 15

#### Based on the Sector Standard 16

- GRI 14: Mining Standard 2024 introduced three new likely material topics to the GRI Standards: 17
- 18 • Artisanal and small-scale mining
- Conflict-affected and high-risk areas 19
- 20 Tailings •
- The Standard contains four other topics with no dedicated (or closely related) existing Topic 21 22 Standards, namely:
- 23 Climate adaptation and resilience<sup>1</sup> •
- 24 Closure and rehabilitation S
- 25 Land and resource rights
- Critical incident management 26 •
- 27 In addition, the topics below list additional sector reporting recommendations covering sector-specific 28 expectations:
- **GHG** emissions 29
- 30 Climate adaptation and resilience
- 31 Air emissions
- Biodiversity 32
- 33 Waste •
- 34 Water and effluents •
- 35 Economic impacts •
- 36 Local communities
- 37 **Rights of Indigenous Peoples**
- 38 Security practices

<sup>&</sup>lt;sup>1</sup> <u>Topic Standard for Climate Change</u> is currently under development, expected for release in 2025.



- 39 Critical incident management
- 40 Occupational health and safety
- 41 Freedom of association and collective bargaining
- Non-discrimination and equal opportunity
- 43 Anti-corruption
- 44 Payments to governments
- 45 Public policy
- 46 While most of the additional sector reporting is highly specific to the impacts related to mining
- 47 activities, not all of it is unique to the sector. <u>Appendix 1</u> lists the additional sector recommendations
- 48 that have been included in previous Sector Standards or can potentially be relevant for future Sector
- 49 Standards.

# 50 Feedback from the Mining Working Group and input

### **received during public exposure**

52 This section synthesizes feedback on GRI Topic Standards provided by the Mining Working Group

and public comment responses received during the public comment period. These inputs focused

- 54 mostly on climate change, labor, local communities, economic impacts, and critical incident
- 55 management.<sup>3</sup>
- 56 The complete list of comments received during public exposure is available on the <u>GRI website</u>.

#### 57 Reporting model of Sector Standards

- Reconsider making (certain) additional sector reporting mandatory to avoid omitting
   disclosure on some of the sector's most critical sustainability impacts (feedback from
   information users).
- Reconsider the requirement to provide an explanation for not reporting information on topics
   listed in a Sector Standard that the organization has determined as not material for them
   (feedback from reporters).
- Reconsider whether certain topics should be considered material for all organizations in a sector to report.

#### 66 Gender

- Strengthen the gender perspective in the GRI Standards, including reporting on specific
   gender impacts, gender equality plans and assessments, disaggregating data by gender in all
   instances where reporting the number of individuals is required; and/or develop a Topic
   Standard for gender.
- Expand on gender-related impacts, and gender-disaggregated data requirements specifically
   throughout GRI community-related Standards.

#### 73 Climate change project

The focus on impact was not perceived clearly enough in Disclosure 201-2 Financial
 implications and other risks and opportunities due to climate change.

<sup>&</sup>lt;sup>3</sup> Critical incidents are expected to be covered by a future project on Pollution, which will also cover *GRI 305: Emissions 2016* (Disclosures 305-6 and 305-7), and *GRI 306: Effluents and Waste 2016* (Disclosure 306-3). More information in the <u>GSSB Work Program 2023-2025</u>.



| 76         | ٠             | Increase clarity about climate adaptation plans, emphasizing focus on impacts and adaptation   |
|------------|---------------|--|
| 77         |               | of communities to climate change, rather than adaptation required to secure the  |
| 78<br>70   |               | organization's assets.   |
| 79<br>80   | •             | Include reporting on whether an assessment has been made on the potential impacts of the   |
| 80<br>81   |               | organization's energy use and emissions reduction initiatives on local communities and a   |
| 81<br>82   |               | description of the results of such reduction initiatives (just transition elements).   |
| 82<br>83   | •             | Include reporting on commitments to achieving net zero GHG emissions, the timeline for the   |
| 83<br>84   | •             | commitment, and any (sectoral) emissions pathways used to inform the commitment.<br>Include reporting on how the goals and targets for GHG emissions are set, and the Scopes             |
| 85         | •             | (1, 2, 3) of GHG emissions, activities, and business relationships to which the goals and $\sim$   |
| 86         |               | targets apply.   |
| 87         | •             | Simplify requirements included in <i>GRI 305: Emissions 2016</i> , especially the ones referring to  |
| 88         | ·             | lists of specific gases (such as GRI 305-2-e) to reduce reporting burden.  |
| 89         | Biodiv        | ersity⁴  |
| 90         | •             | Disclosure on reporting impacts in the supply chain seen as too challenging by business  |
| 91         |               | representatives but as progress on traceability by information users.  |
|            |               |  |
| 92         | Labor         | project  |
| 93         | •             | Introduce a definition or a glossary term for 'contractor', beyond what is covered in the GRI  |
| 94         |               | Glossary (contractor can be a person or organization that signs a contract to supply materials   |
| 95         |               | or workers to perform a service or a job, but also someone who works or provides a service   |
| 96         |               | for a company for a limited period of time and who is not an employee).  |
| 97         | •             | Develop reporting on ratios of standard entry-level wage by gender compared to local living  |
| 98         |               | wage, where available.   |
| 99         | •             | Expand scope of Disclosure 401-3 Parental leave, Disclosure 404-1 Average hours of training  |
| 100        |               | per year per employee, Disclosure 405-2 Ratio of basic salary and remuneration of women to   |
| 101        |               | men, to cover third-party workers such as contractors who are not employees.   |
| 102        | ٠             | Develop reporting on maximum working hours at the operational level.   |
| 103        | •             | Develop reporting on level of occupation by gender and operational site to be able to identify   |
| 104        |               | the male/female divide by occupation.  |
| 105        | •             | Elaborate on female workers' rights in occupational health and safety policies and   |
| 106        |               | procedures.  |
| 107        | •             | Reconsider making recommendation 2.2.1 under Disclosure 403-9 Work-related injuries  |
| 108        |               | mandatory, to report a breakdown by gender, migrant status, age, or worker type.   |
| 109        | •             | Develop reporting around Personal Protective Equipment (PPE).  |
| 110<br>111 | •             | Expand scope of <i>GRI 406: Non-discrimination 2016</i> to include reporting on incidents of sexual harassment and corrective actions/disciplinary measures taken and training on sexual |
| 112        |               | harassment; integration of non-discrimination commitments in recruitment, employment, and  |
| 112        | . (           | promotion; and disclosure of gender equality/equity plans.   |
| 114        |               | Align <i>GRI 408: Child Labor 2016</i> and <i>GRI 409: Forced or Compulsory Labor 2016</i> with  |
| 115        | $\overline{}$ | upcoming human rights due diligence legislation  |
| 116        | •             | Clarify requirements related to Disclosure 408-1 Operations and suppliers at significant risk  |
| 117        |               | for incidents of child labor, and Disclosure 409-1 Operations and suppliers at significant risk  |
| 118        |               | for incidents of forced or compulsory labor, to avoid potentially exposing organizations in the  |
| 119        |               | supply chain to unfounded allegations.   |

<sup>&</sup>lt;sup>4</sup> Due to similar timelines, the Mining exposure draft was published for public comment including the identified relevant disclosures of the Biodiversity exposure draft. Feedback received on the Biodiversity exposure draft disclosures was transferred to the Biodiversity project team for consideration.



| 120<br>121<br>122 | <ul> <li>Expand the scope of <i>GRI 409: Forced or Compulsory Labor 2016</i> to explicitly cover modern slavery, and sharpen gender dimensions of forced labor and modern slavery.</li> <li>Expand scope of <i>CRI 407: Freedom of Association and Collective Bargaining 2016</i> to experiment.</li> </ul> |
|-------------------|---|
| 122               | • Expand scope of <i>GRI 407: Freedom of Association and Collective Bargaining 2016</i> to cover  |
| 123               | job conditions of syndicalists and union representatives, as well as reporting on risks or threa  |
| 124               | situations and actions taken by the organization to prevent or mitigate those in.   |
| 125               | Local communities and Security practices projects   |
| 126               | • Expand the scope of GRI 413: Local Communities 2016 to cover quality of the community   |
| 127               | engagement, environmental and social assessments, and monitoring of impacts.<br>Expand the scope of <i>GRI 411: Rights of Indigenous Peoples 2016</i> to cover free, prior, and informed consent (FPIC), including:   |
| 128               | <ul> <li>policies to ensure respect for Indigenous Peoples' right to FPIC and how these</li> </ul>  |
| 129               | policies are implemented in practice throughout a project lifecycle;  |
| 130               | <ul> <li>access to meaningful information;</li> </ul>   |
| 131               | <ul> <li>whether agreements were reached with Indigenous Peoples and the key terms of</li> </ul>  |
| 132               | those agreements;   |
| 133               | <ul> <li>how the organization records a decision of consent, and how an organization will</li> </ul>  |
| 134               | respect a community decision to withhold consent.   |
| 135               | <ul> <li>Include expectations for reporting on continuous engagement with local communities; expand</li> </ul>  |
| 136               | coverage of FPIC to customary rights holders and other non-Indigenous communities for   |
| 137               | projects that directly interfere with natural resources and have potentially significant impacts  |
| 138               | on land, livelihoods, and human rights of local communities.  |
| 139               | Include reporting on the process to remediate grievances with local communities, as well as   |
| 140               | disclosure on safe and anonymous grievance mechanisms to report incidents with security   |
| 141               | personnel.  |
| 142               | <ul> <li>Develop reporting on community health and safety impacts.</li> </ul>   |
| 143               | Develop disclosures for land and resource rights to cover impacts of resettlement, aligning   |
| 144               | with authoritative and internationally recognized good practices (such as IFC Performance   |
| 145               | Standards).   |
| 146               | • Expand disclosures in GRI 410: Security Practices 2016 to cover risk assessment and regula  |
| 147               | monitoring of security providers; gender-related impacts; training requirements on sexual   |
| 148               | harassment and protection of vulnerable groups; acknowledgment and respect of   |
| 149               | international humanitarian law; fulfilment of the expectations laid out in UNGPs, OECD  |
| 150               | Guidelines on Multinational Enterprises, and the Voluntary Principles on Security and Humar   |
| 151               | Rights (VPSHR); number of encounters between security providers and local communities;  |
| 152               | and number of injuries and fatalities as a result of these encounters.  |
| 153               | Develop disclosures on commitments to protect the rights of human rights defenders.   |
| 154               | Economic impacts project  |
| 155               | Reconsider Disclosure 204-1 Proportion of spending on local suppliers against more  |
| 156               | Greaningful metrics such as the percentage of the number of suppliers that are locally based;   |
| 157               | or reporting on actual spend instead of percentage of the budget.   |
| 158               | Reconsider Disclosure 202-2 Proportion of senior management hired from the local  |
| 159               | community against more meaningful metrics, such as reporting on training, capacity building,  |
| 160               | and recruitment extended to the local community.  |
| 161               | <ul> <li>Include reporting on green processes, technology and innovation, and digital optimization.</li> </ul>  |
| 162               | <ul> <li>Include more guidance to Disclosure 203-1 Infrastructure investments and services</li> </ul>   |
| 163               | supported.  |
| 164               | <ul> <li>Expand scope of <i>GRI 205: Anti-Corruption 2016</i> to cover corruption risks at senior</li> </ul>  |
| 165               | management level, as well as contract procurement processes.  |
| 166               | <ul> <li>Align with IFRS and US GAAP in the definition of 'revenue'.</li> </ul>   |
|                   |   |



#### 167 Critical incidents and pollution

- 168 Include a definition of 'critical incidents' to ensure consistent and sufficient reporting.
- Reconsider list of pollutants in Disclosure 305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), 169 and other significant air emissions, as not all listed pollutants are relevant for all reporting 170 171 organizations.
- 172 Include reporting on "investments of technology that mitigate waste generation" in GRI 306: • 173 Waste 2020.
- 174 Develop disclosures on emergency preparedness and response plans (EPRP).
- Develop disclosures on the management of hazardous materials, including transport, use, 175 sthecss 176 handling, and storage.

#### **Preliminary opinion** 177

Five of the seven topics without a dedicated or closely related Topic Standard - Climate adaptation 178

and resilience, Closure and rehabilitation, Land and resource rights, Critical incident management, 179

- 180 and Conflict-affected and high-risk areas – appear to have a high potential for being likely material for 181 other sectors.
- The ongoing Topic Standards Projects for Climate Change, Labor, and Economic impacts will 182
- consider the feedback provided by the Mining Project as part of the development process. In addition, 183 the GSSB Work Program 2023-2025 covers a number of the proposed topics for revision. 184

185 The community-related standards are perceived as particularly urgent to revise, including GRI 413:

Local Communities 2016 and GRI 411: Rights of Indigenous Peoples 2016. It is also considered 186

187 appropriate to explore developing sector-agnostic disclosures to cover impacts related to land use,

188 resource rights, and resettlement.

- 189 Critical incident management and emergency preparedness and response are identified as needing
- 190 further attention, that could form the basis for a new Topic Standard. Issues related to operating in
- 191 areas of conflict and security practices were also perceived as needing further elaboration.
- 192 The importance of gender as a cross-cutting issue, including expansion of gender-disaggregated data
- 193 in already existing Topic Standards, is anticipated to arise in the future development of Standards for
- 194 other sectors. Further, the reporting model of the Sector Standards, including materiality concept,
- 195 recommended disclosures and requirements, may warrant an assessment. This docume





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# <sup>196</sup> Appendix 1. Overview of reporting disclosures in *GRI 14:*

## 197 *Mining Sector 2024*

The table below lists all reporting disclosures included in *GRI 14: Mining Sector 2024*, classified by Topic Standards disclosures and additional sector reporting. The two columns on the right indicate whether the additional sector reporting has an equivalence in already existing Sector Standards (*GRI 11: Oil and Gas Sector 2021, GRI 12: Coal Sector 2022, GRI 13: Agriculture, Aquaculture and Fishing Sector 2022*), and whether a disclosure could be expected to be relevant for other Sector Standards.

| Торіс     | GRI Topic Standards disclosures                                 | GRI sector additional reporting   | Sector disclosure with<br>an equivalent in other<br>Sector Standards | Potentially<br>relevant<br>for other<br>sectors |
|-----------|---|---|--|---|
|           | Required reporting  | Recommended reporting   | GRI 11, GRI 12, GRI 13   |   |
|           | Disclosure 3-3 Management of material topics                    |   |  |   |
| GHG       | Disclosure 302-1 Energy consumption within the organization     | Č.  |  |   |
|           | Disclosure 302-2 Energy consumption outside of the organization |   |  |   |
| emissions | Disclosure 302-3 Energy intensity                               |   |  |   |
|           | Disclosure 305-1 Direct (Scope 1) GHG                           | When reporting on gross direct (Scope 1) GHG emissions, include land use change emissions | GRI 13   |   |
|           | emissions   | Report a breakdown of the gross direct (Scope 1)<br>GHG emissions by mine site.           | -  |   |
|           | 800   |   |  |   |

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|   | Disclosure 305-2 Energy indirect (Scope<br>2) GHG emissions  | Report a breakdown of the gross location-based<br>energy indirect (Scope 2) GHG emissions by mine<br>site<br>If applicable, report a breakdown of the gross<br>market-based energy indirect (Scope 2) GHG<br>emissions by mine site                        | -                      |     |
|---|--|--|------------------------|-----|
|   | Disclosure 305-3 Other indirect (Scope 3)<br>GHG emissions   | Ó  |                        |     |
|   | Disclosure 305-4 GHG emissions<br>intensity  | Report a breakdown of the GHG emissions intensity ratio by mine site   | -                      |     |
|   | Disclosure 305-5 Reduction of GHG emissions  | 200  |                        |     |
|   |  | Describe the climate change-related scenarios used<br>to assess the resilience of the organization's<br>strategy, including a well-below 2°C, preferably<br>1.5°C, scenario  | GRI 11, GRI 12, GRI 13 | Yes |
| Climate<br>adaptation and<br>resilience | Disclosure 3-3 Management of material topics   | Report whether the organization has a climate<br>change adaptation plan in place and if so, provide a<br>summary of the plan and the progress made in<br>implementing the plan, and describe how<br>engagement with stakeholders has informed the<br>plan  | -                      | Yes |
|   | Disclosure 201-2 Financial implications<br>and other risks and opportunities due to<br>climate change                        | Describe how the substantive changes in<br>operations, revenue, or expenditure due to climate<br>change, affect or could affect the organization's<br>workers and suppliers, its contributions to economic<br>development, and its payments to governments | -                      | Yes |
|   | Disclosure 3-3 Management of material topics   |  |                        |     |
| Air emissions                           | Disclosure 305-7 Nitrogen oxides (NOx),<br>sulfur oxides (SOx), and other significant<br>air emissions                       | For each mine site, report significant air emissions relevant for the site, in kilograms or multiples  | -                      | Yes |
| Biodiversity                            | Disclosure 101-1 Policies to halt and<br>reverse biodiversity loss<br>Disclosure 101-2 Management of<br>biodiversity impacts |  |                        |     |



|       | Disclosure 101-4 Identification of<br>biodiversity impacts              |   |                |
|-------|---|---|----------------|
|       | Disclosure 101-5 Locations with biodiversity impacts                    | Report information on the ecologically sensitive areas for all mine sites.  | -              |
|       | Disclosure 101-6 Direct drivers of<br>biodiversity loss                 | Report direct drivers of biodiversity loss for all mine sites.  | -              |
|       | Disclosure 101-7 Changes to the state of<br>biodiversity                | Report changes in the state of biodiversity for all mine sites.   | -              |
|       | Disclosure 101-8 Ecosystem services                                     | Report information on ecosystem services for all mine sites.  | -              |
|       | Disclosure 3-3 Management of material topics                            |   |                |
|       | Disclosure 306-1 Waste generation and significant waste-related impacts | FICIC   |                |
|       | Disclosure 306-2 Management of<br>significant waste-related impacts     | о.<br>С   |                |
|       | Disclosure 306-3 Waste generated  | When reporting the composition of the waste<br>generated, include a breakdown of the following<br>waste streams:<br>- rock waste;<br>- tailings               | GRI 11, GRI 12 |
| Waste |   | Report a breakdown of the total waste generated<br>and the composition of the waste by mine site  | -              |
|       | Disclosure 306-4 Waste diverted from disposal                           | When reporting the composition of the waste<br>diverted from disposal, include a breakdown of the<br>following waste streams:<br>- rock waste;<br>- tailings. | GRI 11, GRI 12 |
|       | Men   | Report a breakdown of the total waste diverted from disposal and the composition of the waste by mine site  | -              |
|       | Disclosure 306-5 Waste directed to disposal                             | When reporting the composition of the waste directed to disposal, include a breakdown of the following waste streams:   | GRI 11, GRI 12 |



|                     |  | - rock waste;<br>- tailings  |        |
|---------------------|--|--|--------|
|                     |  | Report a breakdown of the total waste directed to disposal and the composition of the waste by mine site   | -      |
|                     | Disclosure 3-3 Management of material topics | Report whether the organization complies with or<br>has committed to comply with a recognized<br>international standard on tailings management,<br>and, if available, provide a link to the most recent<br>publicly disclosed information  | -      |
|                     |  | Report the tailings disposal methods used by the organization  | -      |
| Tailings            | Locument does                                | List the organization's tailings facilities, and report<br>the name, location, and ownership status, including<br>whether the organization is the operator.<br>For each tailings facility not confirmed to be in a<br>state of safe closure:<br>- describe the tailings facility, including its<br>construction method:;<br>- report whether the facility is active, inactive, or<br>closed;<br>- report the maximum permitted storage capacity<br>and the total weight of tailings stored, in metric tons;<br>- report the Consequence Classification in line with<br>Requirement 4.1 of the GISTM;<br>- report the frequency of risk assessments and a<br>summary of the most recent risk assessment<br>findings;<br>- report the date and material findings of the most<br>recent independent technical review, including the<br>implementation of mitigation measures, and the<br>date of the next review. | GRI 12 |
| Water and effluents | Disclosure 3-3 Management of material topics | Describe actions taken to prevent or mitigate negative impacts from acid mine drainage   | GRI 12 |



|                            | Disclosure 303-1 Interactions with water as a shared resource                                    |  |                |     |
|----------------------------|--|--|----------------|-----|
|                            | Disclosure 303-2 Management of water discharge-related impacts                                   |  |                |     |
|                            | Disclosure 303-3 Water withdrawal  | Report water withdrawal by mine site.  | -              |     |
|                            | Disclosure 303-4 Water discharge   | Report water discharge by mine site.   | -              |     |
|                            | Disclosure 303-5 Water consumption   | Report water consumption by mine site.   | -              |     |
|                            | Disclosure 3-3 Management of material topics   | Describe how engagement with workers, suppliers,<br>local communities, and other relevant stakeholders<br>has informed closure planning and implementation,<br>including post-mining land use.     | GRI 11, GRI 12 | Yes |
|                            | Disclosure 402-1 Minimum notice periods regarding operational changes                            | i ci al  |                |     |
|                            | Disclosure 404-2 Programs for upgrading<br>employee skills and transition assistance<br>programs |  |                |     |
| Closure and rehabilitation |  | For each mine site, report whether it:<br>- has a closure and rehabilitation plan in place;<br>- is undergoing closure and rehabilitation activities;<br>- has been closed and rehabilitated       | GRI 11, GRI 12 | Yes |
|                            | S  | For each closure and rehabilitation plan:<br>- report whether the plan has been approved by<br>relevant authorities;<br>- report the dates of the most recent and next<br>reviews of the plan      | -              | Yes |
|                            | entdoe   | For each mine site, report in hectares:<br>- total land disturbed and not yet rehabilitated;<br>- total land disturbed and rehabilitated (including<br>progressively rehabilitated, if applicable) | -              | Yes |
|                            | C <sup>U</sup>   | For each mine site, report the estimated life of the mine (LOM)  | -              |     |
|                            | This doc   |  |                |     |



|                     |  | For financial provisions made by the organization<br>for closure and rehabilitation, including<br>environmental and socioeconomic post-closure<br>monitoring and aftercare for mine sites, report:<br>- For each mine site, report the total estimated<br>closure cost (not discounted), whether the financial<br>provision covers the full amount of the current<br>estimated closure cost, and whether the financial<br>provision made is in line with the applicable national<br>regulatory requirements;<br>- the methodology used to calculate the estimated<br>closure cost;<br>- financial instruments used or developed to<br>guarantee adequate financial provisions for closure<br>and rehabilitation | GRI 11, GRI 12 | Yes |
|---------------------|--|---|----------------|-----|
|                     |  | Describe non-financial provisions made by the<br>organization to manage the local community's<br>socioeconomic transition to a sustainable post-<br>mining economy, including collaborative efforts,<br>projects, and programs  | GRI 12         | Yes |
|                     | Disclosure 3-3 Management of material topics                       | Describe the approach to providing employment,<br>procurement, and training opportunities to local<br>communities.  | GRI 11, GRI 12 | Yes |
|                     | Disclosure 201-1 Direct economic value generated and distributed   | Report community investments by mine site.  | GRI 11, GRI 12 | Yes |
| Economic<br>impacts | Disclosure 203-1 Infrastructure investments and services supported | Report whether a community needs assessment<br>was conducted to<br>determine the need for infrastructure and services,<br>and how the<br>assessment informed the infrastructure investments<br>and services<br>supported.   | -              | Yes |
|                     | Disclosure 203-2 Significant indirect economic impacts             | Report the number, total spend, and description of education and skills programs deployed for workers who are not employees   | GRI 13         | Yes |



|             | Disclosure 204-1 Proportion of spending on local suppliers  | Report the percentage of the organization's procurement budget spent on local suppliers by mine site.  | -              |     |
|-------------|---|--|----------------|-----|
|             |   | Report the percentage of workers hired from the local community at the mine-site level, broken down by gender, and the organization's definition used for 'local community'.   | -              | Yes |
|             |   | Describe the approach to identifying stakeholders,<br>including vulnerable groups, within local<br>communities   | GRI 11, GRI 12 | Yes |
|             | Disclosure 3-3 Management of material topics  | Describe the approach to engaging with local<br>communities at each phase of the life of the mine,<br>including:<br>- how the organization seeks to ensure meaningful<br>engagement;<br>- how the organization supports safe and equitable<br>gender participation   | GRI 11, GRI 12 | Yes |
| Local       |   | Describe the approach to developing and<br>implementing community development programs,<br>including how engagement with local stakeholders,<br>impact assessments, and community needs<br>assessments have informed the programs  | -              | Yes |
| communities | Disclosure 413-1 Operations with local community engagement, impact assessments, and development programs     | Report any formal community development agreements made by the organization, by mine site  | -              |     |
|             | Disclosure 413-2 Operations with<br>significant actual and potential negative<br>impacts on local communities | For each mine site, describe impacts on the health and safety of local communities   | GRI 11, GRI 12 | Yes |
|             | is document du  | For each mine site, report:<br>- the number and types of grievances from local<br>communities during the reporting period;<br>- the percentage of grievances that were addressed<br>and resolved during the reporting period;<br>- the percentage of grievances resolved through<br>remediation during the reporting period. | GRI 11, GRI 12 | Yes |



|                          |  | Describe the approach to identifying Indigenous<br>Peoples who are or could be affected by the<br>organization's activities   | -                      | Yes |
|--------------------------|--|---|------------------------|-----|
|                          | Disclosure 3-3 Management of material topics                                     | Describe the approach to engaging with Indigenous<br>Peoples, including:<br>- how the organization seeks to ensure meaningful<br>engagement;<br>- how the organization supports safe and equitable<br>gender participation  | GRI 11, GRI 12, GRI 13 | Yes |
|                          |  | Describe the policies or commitments, and actions taken to respect Indigenous Peoples' cultural heritage  | -                      | Yes |
| Rights of                |  | Describe the community development programs in place that are intended to enhance positive impacts for Indigenous Peoples   | GRI 11, GRI 12         | Yes |
| Indigenous<br>Peoples    | Disclosure 411-1 Incidents of violations involving rights of iIndigenous Peoples | Describe the identified incidents of violations<br>involving the rights of Indigenous Peoples   | GRI 11, GRI 12, GRI 13 | Yes |
|                          |  | List the locations of operations and proven reserves<br>where Indigenous Peoples are present and are or<br>may be affected by the activities of the organization  |                        | Yes |
|                          | ant does f   | Report whether the organization has been involved<br>in a process of seeking free, prior, and informed<br>consent (FPIC) from Indigenous Peoples for any of<br>the organization's activities and, if so, report for<br>each case:<br>- whether the process has been mutually accepted<br>by the organization and the affected Indigenous<br>Peoples;<br>- whether an agreement has been reached, and if<br>so, if the agreement is publicly available | GRI 11, GRI 12, GRI 13 | Yes |
| Land and resource rights | Disclosure 3-3 Management of material topics                                     | Describe the approach to engaging with<br>stakeholders whose rights to land and resources<br>are or could be affected by the organization's<br>activities, including:<br>- how the organization seeks to ensure meaningful<br>engagement;   | GRI 11, GRI 12         | Yes |



|  |  | - how the organization supports safe and equitable gender participation  |                        |     |
|--|--|--|------------------------|-----|
|  |  | Describe the policies, commitments, and plans<br>providing remediation to local communities or<br>individuals subject to involuntary resettlement, and<br>the process for establishing compensation for loss<br>of assets, or other assistance to improve or restore<br>standards of living or livelihoods                         | GRI 11, GRI 12         | Yes |
|  |  | Describe the procedures in place to monitor and<br>evaluate the effectiveness of the actions taken to<br>remediate negative impacts from involuntary<br>resettlement and the corrective actions taken where<br>necessary.  | -                      | Yes |
|  |  | List the mine sites where involuntary resettlement is<br>planned, ongoing, or has taken place.<br>For each mine site listed:<br>- report the number of persons who have been or<br>will be displaced, and a breakdown by gender;<br>- describe how peoples' livelihoods and human<br>rights are or could be affected and restored. | GRI 11, GRI 12, GRI 13 | Yes |
|  | 1t does                                      | List the locations of operations where conflicts or<br>violations of land and resource rights (including<br>customary, collective, and informal tenure rights)<br>occurred, and describe the incidents and the<br>stakeholders whose rights are or could be affected.  | GRI 13                 | Yes |
| Artisanal and<br>small-scale<br>mining | Disclosure 3-3 Management of material topics | Describe the approach to engaging with ASM operators, and the actions taken by the organization to support ASM formalization and professionalization efforts   | -                      |     |
|  | This   |  |                        |     |



|                                 |  | Describe the programs in place to enhance positive<br>impacts or mitigate negative impacts involving<br>ASM, including:<br>- whether and how the programs incorporate<br>gender considerations,<br>- how engagement with local authorities and<br>communities has informed the programs                 | -              |     |
|---------------------------------|--|---|----------------|-----|
|                                 |  | If sourcing from artisanal and small-scale mining,<br>describe the policies in place and the process used<br>to identify and assess actual and potential negative<br>impacts  | -              |     |
|                                 |  | List the mine sites where ASM occurs on or in close proximity to the site   | -              |     |
|                                 |  | Report the total number and nature of incidents involving ASM and actions taken to address them   | <u> </u>       |     |
| Security<br>practices           | Disclosure 3-3 Management of material  | Describe how the organization seeks to prevent or<br>mitigate potential negative impacts from the use of<br>public and private security providers   | GRI 11, GRI 12 |     |
|                                 | topics   | Report whether the organization is implementing<br>the Voluntary Principles on Security and Human<br>Rights   | -              | Yes |
| Critical incident<br>management | Disclosure 410-1 Security personnel<br>trained in human rights policies or<br>procedures | AT CONTRACTOR   |                |     |
|                                 | Disclosure 3-3 Management of material topics   | Describe the organization's approach to emergency<br>preparedness and response plans, including<br>frequency of testing the plans, and how<br>engagement with local communities, workers,<br>public sector agencies, first responders, and local<br>authorities and institutions has informed the plans | -              | Yes |
|                                 | Disclosure 306-3 Significant spills  |   |                |     |
|                                 | 90 <sup>C</sup> ).   | Report the number of critical incidents in the reporting period, describe their impacts, and actions taken to remediate them  | GRI 11, GRI 12 | Yes |



|                                      |   | Report the percentage of mine sites that have<br>emergency preparedness and response plans in<br>place, and a list of the sites that do not  | - |     |
|--------------------------------------|---|--|---|-----|
|                                      | Disclosure 3-3 Management of material topics  |  |   |     |
|                                      | Disclosure 403-1 Occupational health and<br>safety management system  |  |   |     |
|                                      | Disclosure 402 2 Hozard identification  | Report how the organization ensures the provision<br>of gender-appropriate personal protective<br>equipment for workers  | - |     |
|                                      | Disclosure 403-2 Hazard identification,<br>risk assessment, and incident<br>investigation   | Describe the processes used to identify work-<br>related incidents due to<br>sexual and gender-based violence, and to<br>determine corrective<br>actions.  | - |     |
|                                      | Disclosure 403-3 Occupational health services   |  |   |     |
| Occupational<br>health and<br>safety | Disclosure 403-4 Worker participation,<br>consultation, and communication on<br>occupational health and safety                          | Report how the organization seeks to ensure<br>women's participation in formal joint management-<br>worker health and safety committees, and the<br>percentage of women represented in these<br>committees | - | Yes |
|                                      | Disclosure 403-5 Worker training on<br>occupational health and safety   |  |   |     |
|                                      | Disclosure 403-6 Promotion of worker health   | 0,   |   |     |
|                                      | Disclosure 403-7 Prevention and<br>mitigation of occupational health and<br>safety impacts directly linked by business<br>relationships |  |   |     |
|                                      | Disclosure 403-8 Workers covered by an<br>occupational health and safety<br>management system   |  |   |     |
|                                      | Disclosure 403-9 Work-related injuries  |  |   |     |
|                                      | Disclosure 403-10 Work-related ill health   |  |   |     |



|                                       | Disclosure 3-3 Management of material topics   |       |  |
|---------------------------------------|--|-------|--|
|                                       | Disclosure 202-1 Ratios of standard<br>entry-level wage by gender compared to<br>local minimum wage                        |       |  |
|                                       | Disclosure 401-1 New employee hires<br>and employee turnover   |       |  |
|                                       | Disclosure 401-2 Benefits provided to full-<br>time employees that are not provided to<br>temporary or part-time employees | ilion |  |
| Employment                            | Disclosure 401-3 Parental leave  | 05    |  |
| practices                             | Disclosure 402-1 Minimum notice periods regarding operational changes  |       |  |
|                                       | Disclosure 404-1 Average hours of training per year per employee   | ALC . |  |
|                                       | Disclosure 404-2 Programs for upgrading<br>employee skills and transition assistance<br>programs                           | t an  |  |
|                                       | Disclosure 414-1 New suppliers that were screened using social criteria  | Serti |  |
|                                       | Disclosure 414-2 Negative social impacts in the supply chain and actions taken   |       |  |
|                                       | Disclosure 3-3 Management of material topics   | Ŏ     |  |
| Child labor                           | Disclosure 408-1 Operations and<br>suppliers at significant risk for incidents of<br>child labor                           |       |  |
|                                       | Disclosure 414-1 New suppliers that were screened using social criteria  |       |  |
| Forced labor<br>and modern<br>slavery | Disclosure 3-3 Management of material topics   |       |  |
|                                       | Disclosure 409-1 Operations and<br>suppliers at significant risk for incidents of<br>forced or compulsory labor            |       |  |
|                                       | < his  |       |  |



|  | Disclosure 414-1 New suppliers that were screened using social criteria  |   |                |     |
|--|--|---|----------------|-----|
| Freedom of<br>association<br>and collective        | Disclosure 3-3 Management of material<br>topics  |   |                |     |
|  | Disclosure 407-1 Operations and<br>suppliers in which the right to freedom of<br>association and collective bargaining may<br>be at risk |   |                |     |
| bargaining   |  | Report the number of strikes and lockouts involving 1,000 or more workers lasting one full shift or longer, and their total duration in worker days idle                                      | -              | Yes |
|  | Disclosure 3-3 Management of material topics   | · Al  |                |     |
|  | Disclosure 202-2 Proportion of senior<br>management hired from the local<br>community  | Report a breakdown of the percentage of senior<br>management hired from the local community by<br>gender  | -              | Yes |
|  | Disclosure 401-3 Parental leave  |   |                |     |
| Noo  | Disclosure 404-1 Average hours of training per year per employee   |   |                |     |
| Non-<br>discrimination<br>and equal<br>opportunity | Disclosure 405-1 Diversity of governance bodies and employees  | Report whether the organization has a gender<br>equality or gender equity plan or policy in place<br>and, if so, provide a summary of the plan, and<br>progress made in implementing the plan | -              | Yes |
|  | Disclosure 405-2 Ratio of basic salary   | Report the ratio of basic salary and remuneration of women to men by mine site  | -              |     |
|  | and remuneration of women to men   | Report the ratio of basic salary and remuneration by other relevant indicators of diversity, by mine site   | -              |     |
|  | Disclosure 406-1 Incidents of<br>discrimination and corrective actions<br>taken  |   |                |     |
| Anti-corruption                                    | Disclosure 3-3 Management of material topics   | Describe how potential impacts of corruption or<br>risks of corruption are managed in the<br>organization's procurement practices and<br>throughout the supply chain                          | GRI 11, GRI 12 | Yes |



|                         | Disclosure 205-1 Operations assessed for risks related to corruption                      |  |                |
|-------------------------|---|--|----------------|
|                         | Disclosure 205-2 Communication and training about anti-corruption policies and procedures |  |                |
|                         | Disclosure 205-3 Confirmed incidents of corruption and actions taken                      |  |                |
|                         |   | Describe the approach to contract transparency,<br>including:<br>- whether contracts and licenses are made publicly<br>available and, if so, where they are published;<br>- if contracts or licenses are not publicly available,<br>the reason for this and actions taken to make them<br>public in the future | GRI 11, GRI 12 |
|                         |   | Report the following information about the<br>organization's beneficial owners, including joint<br>ventures:<br>- name, nationality, and country of residence;<br>- Whether they are politically exposed persons;<br>- level of ownership;<br>- how ownership or control is exerted                            | GRI 11, GRI 12 |
| Payments to governments | Disclosure 3-3 Management of material topics  | , eQ   |                |
|                         | Disclosure 201-1 Direct economic value generated and distributed                          | Ŏ`   |                |
|                         | Disclosure 201-4 Financial assistance received from government                            | For state-owned organizations (SOEs):<br>- Report the financial relationship between the<br>government and the SOE   | GRI 11, GRI 12 |
|                         | Disclosure 207-1 Approach to tax  |  |                |
|                         | Disclosure 207-2 Tax governance, control, and risk management                             |  |                |
|                         | Disclosure 207-3 Stakeholder<br>engagement and management of<br>concerns related to tax   |  |                |
|                         | THIS  |  |                |



|  | Disclosure 207-4 Country-by-country          | Report a breakdown of the organization's corporate<br>income tax paid and accrued in profit/loss, and<br>other payments to governments, levied at the<br>project-level, by project, and by material revenue<br>stream  | GRI 11, GRI 12 |     |
|--|--|--|----------------|-----|
|  | reporting                                    | Report any thresholds that have been applied and<br>any other contextual information necessary to<br>understand how the project-level payments to<br>governments reported have been compiled   | GRI 11, GRI 12 |     |
|  |  | For minerals purchased from the state or from third<br>parties appointed by the state to sell on their behalf,<br>report:<br>- volumes and types of minerals purchased;<br>- full names of the selling entity and the recipient of<br>the payment;<br>- payments made for the purchase   | GRI 11, GRI 12 |     |
| Public policy                                | Disclosure 3-3 Management of material topics | Report whether the organization is a member of, or<br>contributes to, any representative associations or<br>committees that participate in public policy<br>development and lobbying, including:<br>- the nature of this contribution;<br>- any differences between the organization's stated<br>policies, goals, or other public positions on<br>significant issues and the positions of the<br>representative associations or committees | GRI 11, GRI 12 | Yes |
|  | Disclosure 415-1 Political contributions     | <u>.</u>   |                |     |
| Conflict-<br>affected and<br>high-risk areas | Disclosure 3-3 Management of material topics | Describe the approach to ensuring adherence to<br>international humanitarian law when operating in<br>conflict-affected and high-risk areas  | -              | Yes |
|  |  | List the locations of operations in conflict-affected or high-risk areas and how these were identified   | GRI 11, GRI 12 | Yes |
|  | This docum                                   | Describe the due diligence process applied for<br>operations in, or when sourcing from, conflict-<br>affected and high-risk areas and whether it aligns<br>with the OECD Due Diligence Guidance for  | -              | Yes |



|      | Responsible Supply Chains of Minerals from<br>Conflict-Affected and High-Risk Areas.  |     |
|------|---|-----|
|      | For operations in conflict-affected or high-risk<br>areas, report the potential negative impacts on<br>workers and local communities, including actions to<br>prevent or mitigate the impacts | Yes |
|      | areas, report the potential negative impacts on<br>workers and local communities, including actions to<br>prevent or mitigate the impacts   |     |
|      | at does not represe   |     |
|      | This document   |     |
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